

July 28, 2003

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Review of the Spectrum Sharing Plan Among Non-Geostationary Satellite  
Orbit Mobile Satellite Service Systems in the 1.6/2.4 GHz Band – IB  
Docket No. 02-364*

*Amendment of Part 2 of the Commission's Rules to Allocate Spectrum  
Below 3 GHz for Mobile and Fixed Services To Support the Introduction  
of New Advanced Wireless Services, including Third Generation Wireless  
Systems - ET Docket No. 00-258*

Dear Ms. Dortch:

On April 28, 2003, Verizon Wireless filed reply comments in ET Docket No. 00-258 in which it suggested for the first time that the 2490-2500 MHz band could be viable relocation spectrum for Multipoint Distribution Service ("MDS") licensees displaced from the 2150-2162 MHz band in order to clear the 2150-2155 MHz band for Advanced Wireless Services ("AWS").<sup>1</sup> Subsequently, on July 7, 2003, Verizon submitted a copy of those reply comments into the record for the Commission's *Notice of Proposed Rulemaking* in IB Docket No. 02-364, in which the Commission has asked for comment on whether and for what services it should reallocate any of the "Big LEO"

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<sup>1</sup> See Reply Comments of Verizon Wireless, ET Docket No. 00-258, at 7-8 (filed April 28, 2003)

Mobile Satellite Service ("MSS") downlink spectrum at 2483.5-2500 MHz.<sup>2</sup> On July 25, 2003, the Wireless Communications Association International, Inc. ("WCA") filed reply comments in IB Docket No. 02-364 demonstrating that Verizon's proposal has no technical merit and thus reaffirms that the G Block remains the only viable relocation spectrum for MDS licensees displaced from the 2150-2162 MHz band. On the same day, WCA submitted a copy of its reply comments into the record for ET Docket No. 00-258 to ensure that they are accorded proper consideration in that proceeding.

WCA has learned that the technical study submitted with its reply comments in IB Docket No. 02-364 inadvertently included an incorrect version of Figure 5, which depicts the brute force overload interference that Multipoint Distribution Service ("MDS") downstream operations would suffer from Broadcast Auxiliary Service ("BAS") upstream operations if MDS were relocated to the 2490-2500 MHz band. Accordingly, a revised study with the correct version of Figure 5 is being submitted herewith for inclusion into the record for IB Docket No. 02-364 and ET Docket No. 00-258. WCA asks that the revised study supersede the one submitted with its reply comments on July 25.

Should there be any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Andrew Kreig  
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Andrew Kreig  
President

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<sup>2</sup> See Letter from John T. Scott, III, Vice President & Deputy General Counsel, Verizon Wireless, IB Docket No. 02-364 (July 7, 2003).